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5 U.S. DISTRICT COURT
6

7 MIDDLE DISTRICT OF PENNSYLVANIA
8

9 FRANK TUFANO ,
10 Plaintiff,
11 vs.
12 PAUL SALADINO, MD
13 JEFFREY DAVIS, ESQ.
14 WHITE PLAINS LODGE #473
15 THE ILLUMINATI
16 Defendants

Case No.:

3 : CV -25 - 0262

VERIFIED COMPLAINT

**FILED
SCRANTON**

FEB 12 2025

PER SJ DEPUTY CLERK

- 16 1. Frank Tufano is a YouTuber, a social media personality who started his
17 YouTube channel in 2016 to share his unique research on health and nutrition in
18 order to better the lives of people all over the world.
19
20 2. Frank Tufano was the first “YouTuber” to follow the Carnivore Diet, an all
21 meat diet, and had many unique trend-setting ideas that many others would
22 follow in the coming years.
23
24 3. In early 2019, Frank Tufano realized that Paul Saladino, MD, was “copying”
25 Frank Tufano’s nutritional research, word for word, from his videos, to promote
26 his own personal being. Paul Saladino adapted many of Frank Tufano’s ideas as
27 his own, even coining himself as “CarnivoreMD.”

- 1 4. Over the course of time Frank Tufano realized that Paul Saladino was no
- 2 ordinary copycat, the level of planning and scheming against Frank Tufano was
- 3 beyond anything he had experienced before in his life.
- 4
- 5 5. A nightmare of legal and personal harassment unfolded against Frank Tufano
- 6 over the next several years, where Frank Tufano had lost his family relationships,
- 7 all personal relationships, his business, essentially ruining his life.
- 8
- 9 6. Frank Tufano has come to the conclusion that Paul Saladino is an “industry
- 10 plant,” an actor that is being used by the “elite,” secret societies, to funnel
- 11 money and attention into their own businesses.
- 12
- 13 7. All wealthy and powerful people are members of various secret societies, The
- 14 Illuminati and Freemasons being two of the most well known fraternal
- 15 organizations.
- 16
- 17 8. Frank Tufano recognized the presence of Freemasonic Lodges in most cities
- 18 throughout the United States as well as the common symbolism that Illuminati
- 19 members used to interact with each other on social media.
- 20
- 21 9. Despite Paul Saladino being a newly minted doctor with no social media
- 22 presence, he was quickly in the spotlight as a health and nutrition expert,
- 23 mingling with celebrities such as Bear Grylls and Georges St Pierre, even
- 24 appearing on the Joe Rogan Podcast, the largest podcast platform online.
- 25
- 26 10. Paul Saladino’s supplement company “Heart & Soil,” uses a logo with horns,
- 27 emulating Baphomet, a satanic figure commonly worshiped by various secret
- 28 societies.

1 11. Whether Paul Saladino is a member of these specific secret societies, or other
2 unknown ones, is irrelevant to the fact that it would take a team of highly
3 experienced and organized people to campaign against Frank Tufano in the
4 manner that has occurred over the past several years.
5

6 12. In the case Saladino, MD v. Frank Tufano No. 7:2020cv09346, Frank Tufano
7 was denied several amendment rights and also fell victim to malpractice by
8 Jeffrey Davis, Esq.

9 13. Frank Tufano's First Amendment Right to Freedom of Speech, and Seventh
10 Amendment Right to a Jury Trial in Civil Lawsuits by the premise of the lawsuit
11 just mentioned and denial of any of Frank Tufano's attempted motions in this
12 case.

14 14. Jeffrey Davis was retained by Frank Tufano initially in the case, but failed to
15 communicate court proceedings to Frank Tufano, resulting in a default
16 judgement which the court did not allow him to vacate.
17

18 15. Whether this miscommunication was intentional or not, Jeffrey Davis's actions
19 later hostility towards Frank Tufano, including calling him personally on his cell
20 phone and making physical threats against his life, has given Frank Tufano the
21 assumption that Jeffrey Davis has ill intentions against Frank Tufano.
22

23 16. Frank Tufano believes Jeffrey Davis, as well as all lawyers, are members of
24 Freemasonry or various secret societies, and because Frank Tufano himself is
25 not a member of such groups or organizations, Jeffrey Davis had an obligation
26 to defend his fellow secret society brethren Paul Saladino.
27

- 1 17. In all of these secret groups, members go through trials and swear oaths to
2 secrecy that override all laws known to US citizens.
- 3 18. *'Handshakes are what secretly identifies a fellow mason in order to show favor. Masonic oaths*
4 *trump laws of the land and any oath to an official office. Example: Even if a fellow Mason is*
5 *guilty of a crime, another Mason who is a prosecutor or judge is bound, by his Masonic oath, to*
6 *set him free.'*
- 7
- 8 19. Because of these oaths, any judicial decision made outside of a jury, would not
9 be in favor to Frank Tufano as a non secret society member. Even if a jury was
10 selected, it would be impossible to ensure that the intentions of the jury
11 members are not corrupt by secret society influence as their oaths precede any
12 obligation of truth to the court.
- 13
- 14 20. Frank Tufano's recent court experience have given him confidence in some
15 unknown bias against him. In the past year he has filed almost a dozen cases in
16 both Federal and State Court where the judge promptly dismissed the case, not
17 allowing for even initial proceedings.
- 18
- 19 21. Instead of Paul Saladino apologizing and continuing his job with his fellow
20 psychiatric patients, as he is a psychiatrist by training, Paul Saladino has used his
21 secret society connections and influence to maliciously copy Frank Tufano's
22 entire persona, his life's work while using the same connections to utilize the
23 court system in silencing Frank Tufano from defending himself.
- 24
- 25 22. All of Paul Saladino's ideas, businesses, his current 'Animal Based Diet,' all
26 originated from Frank Tufano's YouTube channel. However, because of Paul
27 Saladino's Secret Society connections, and the influence and control that these
- 28

1 groups such as Freemasons and Illuminati have over all of social media, Paul
2 Saladino has become known by millions as what Frank Tufano sought out to be.

3 23. Paul Saladino has been recognized globally with total social media viewership
4 exceeding hundreds of millions, spouting Frank Tufano's life work. While Frank
5 Tufano has been shadow banned and censored by these same Secret Society
6 groups that promote Paul Saladino.

7 24. Paul Saladino has achieved everything that Frank Tufano sought out to do
8 through lies, deceit, and illegitimate work, yet still tries to attack and silence
9 Frank Tufano through the Court System using his secret society connections.
10

11 25. It would be clear from any outsider viewing the situation that Paul Saladino is on
12 a shameful and disgusting tirade with only selfish intentions to increase his
13 personal reputation and wealth at the expense of others. The support of his
14 fellow secret society brethren on this journey show how these organizations in
15 control are likely colluding for financial gain.
16

17 **JURISDICTION**

18 26. Paul Saladino MDs is assumed to still be residing in Costa Rica, as he is
19 frequently seen making current social media posts about surfing from his
20 domicile in Costa Rica.

21 27. Jeffrey Davis, Esq currently resides and operates his law firm out of Westchester
22 County, NY

23 28. White Plains Lodge #473 is a Masonic Lodge where conversations pertaining
24 to this case likely occurred in White Plains, NY.
25

29. The Illuminati is multiple conspirators working alongside Paul Saladino as his business partners and associates.

FIRST CLAIM FOR RELIEF
Civil Conspiracy

30. Paul Saladino MD met in secrecy with Freemasons, Illuminati Members, and other relevant secret society parties in the case, and influenced them to conspire against Frank Tufano.

31. Agents of these secret societies conspired against Frank Tufano by shadowbanning and censoring his videos on social media exposing what was being done to him and promoting Paul Saladino's videos plagiarizing Frank Tufano's work.

32. Associates of the case “Saladino, MD v. Frank Tufano No. 7:2020cv09346,” agreed in secrecy to plan all decisions against Frank Tufano in favor of Paul Saladino, MD.

SECOND CLAIM FOR RELIEF
18 U.S. Code § 241 - Conspiracy against rights

33. Paul Saladino MD and all secret society associates involved in “Saladino, MD v. Frank Tufano No. 7:2020cv09346” conspired against Frank Tufano oppressing him of his First and Seventh Amendment Rights.

First Amendment Right to Freedom of Speech

A. Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech,

1 or of the press; or the right of the people peaceably to assemble, and to
2 petition the Government for a redress of grievances.

3 Seventh Amendment Right to a Jury Trial. The Seventh Amendment to the
4 United States Constitution protects the right to a jury trial in federal civil cases
5 that meet certain requirements:

- 6
- 7 A. The value in controversy must exceed \$20
 - 8 B. The right to a jury trial applies to suits at common law
 - 9 C. Judges cannot re-examine facts presented by the jury, except in accordance with
10 common law rules.

11

12 The case meets all the requirements of the Seventh Amendment, which was
13 created to protect citizens from government overreach by establishing the right
14 to a jury trial in civil cases.

15 34. The premise of the case is based on Frank Tufano's public statements on his
16 YouTube channel, all of which to Frank Tufano's knowledge were said truthfully
17 to his available resources.

18 35. The members of this case had no intention of giving Frank Tufano a fair trial as
19 it is irrelevant to their sworn oaths to defend their fellow secret society members,
20 all decisions were placed in the hands of an individual judge who may or may not
21 have attended meetings at a Masonic Lodge to discuss case decisions in secrecy.
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24

25 **PRAYER FOR RELIEF**

26 36. WHEREFORE, by reason of the acts and circumstances alleged herein, Frank Tufano
27 seeks relief from this Court as follows:
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- 1 A. Economic Damages for all of stolen business ventures in an amount
- 2 determined by 50% of Paul Saladino's gross business sales.
- 3
- 4 B. Economic Damage for stealing proprietary material, an amount determined
- 5 by 100% of Paul Saladino's gross income from social media monetization.
- 6
- 7 C. Economic Damages for impersonating Frank Tufano's material, an amount
- 8 determined by 50% of Paul Saladino's gross book sales.
- 9
- 10 D. Jeffrey K. Davis, Esq. to furnish all of Frank Tufano's legal expenses
- 11 occurring as a result of his malpractice.

12
13 Dated: Wednesday, February 12, 2025
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